

ORIGINAL

Approved: M. ShinCHRISTY SLAVIK  
Assistant United States AttorneyBefore: HONORABLE KATHARINE H. PARKER  
United States Magistrate Judge  
Southern District of New York

21 MAG 7241

- - - - -	x	
	:	
UNITED STATES OF AMERICA	:	<b><u>COMPLAINT</u></b>
	:	
- v. -	:	Violations of
	:	21 U.S.C. §§ 841 and
	:	846; 18 U.S.C. § 924(c)
WILLIAM ERDOGAN,	:	
	:	COUNTY OF OFFENSE:
Defendant.	:	NEW YORK
	:	
- - - - -	x	

SOUTHERN DISTRICT OF NEW YORK, ss.:

ANTHONY MANGANO, being duly sworn, deposes and says that he is a detective with the New York City Police Department ("NYPD") and charges as follows:

**COUNT ONE****(Possession with Intent to Distribute Narcotics)**

1. On or about July 20, 2021, in the Southern District of New York and elsewhere, WILLIAM ERDOGAN, the defendant, knowingly and intentionally possessed with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

2. The controlled substances involved in the offense were 400 grams and more of mixtures and substances containing a detectable amount of fentanyl and heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 841(a)(1) and  
841(b)(1)(A).)

**COUNT TWO**

**(Distribution and Possession with Intent to Distribute  
Narcotics)**

3. On or about July 7, 2021, in the Southern District of New York and elsewhere, WILLIAM ERDOGAN, the defendant, knowingly and intentionally distributed and possessed with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

4. The controlled substances involved in the offense were 40 grams and more of mixtures and substances containing a detectable amount of fentanyl and heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Sections 841(a)(1) and  
841(b)(1)(B).)

**COUNT THREE**

**(Distribution and Possession with Intent to Distribute  
Narcotics)**

5. On or about July 1, 2021, in the Southern District of New York and elsewhere, WILLIAM ERDOGAN, the defendant, knowingly and intentionally distributed and possessed with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

6. The controlled substances involved in the offense were 40 grams and more of mixtures and substances containing a detectable amount of fentanyl and heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Sections 841(a)(1) and  
841(b)(1)(B).)

**COUNT FOUR**

**(Firearms Use, Carrying, and Possession)**

7. On or about July 1, 2021, in the Southern District of New York and elsewhere, WILLIAM ERDOGAN, the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics offense charged in Count Three of this Complaint, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm.



(Title 18, United States Code, Section 924(c)(1)(A)(i).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

8. I am a detective with the NYPD and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with other law enforcement agents and witnesses, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

9. Based on my participation in this investigation, my review of law enforcement reports and records, and my conversations with other law enforcement officers, I have learned, in substance and in part, the following:

a. An undercover officer who works for the NYPD ("UC-1") was introduced to WILLIAM ERDOGAN, the defendant, on or about June 30, 2021. On or about the same day, UC-1 received a phone call from ERDOGAN regarding the sale of heroin, as well as a Ruger Tec-9-style semi-automatic pistol (the "Firearm") that ERDOGAN had for sale. During the course of the conversation, UC-1 agreed to purchase 100 grams of heroin from ERDOGAN for \$6,500. ERDOGAN informed UC-1, in substance and in part, that ERDOGAN needed to hold on to the Firearm for a few weeks for "protection," but expressed interest in selling the Firearm to UC-1 at a later date. UC-1 and ERDOGAN arranged to meet on July 1, 2021 in Manhattan at a specific location (the "Meeting Location").

b. On or about July 1, 2021, at approximately 3:18 p.m., ERDOGAN arrived in a sedan to the Meeting Location. UC-1 entered ERDOGAN's sedan and immediately saw that ERDOGAN had the Firearm in his lap. UC-1 was equipped with a video recording device that recorded UC-1's interaction with ERDOGAN. ERDOGAN then handed UC-1 a ziplock baggie containing a beige rock-like substance, which weighed approximately 100 grams and later tested positive for heroin, fentanyl, and para-fluorofentanyl. In exchange, UC-1 gave ERDOGAN \$6,500 in United States currency. As ERDOGAN counted the money, UC-1 informed



ERDOGAN that UC-1 had \$1,000 to buy the Firearm. ERDOGAN countered, asking for \$1,300. UC-1 told ERDOGAN that UC-1 only had \$1,000, but that on their next transaction, UC-1 would provide ERDOGAN with an additional \$300. ERDOGAN agreed, and proceeded to take the magazine out of the Firearm, remove a bullet from the chamber of the Firearm, and handed UC-1 the Firearm, the magazine, and the bullet.

c. Subsequently, on or about July 6, 2021, ERDOGAN initiated contact with UC-1 by text message. During the exchange, ERDOGAN and UC-1 agreed to meet at the Meeting Location on July 7, 2021, where UC-1 would purchase 100 grams of heroin from ERDOGAN for \$6,500, and also pay ERDOGAN the remaining \$300 from the sale of the Firearm. UC-1 and ERDOGAN also discussed ERDOGAN eventually selling 500 grams of heroin to UC-1 for \$30,000. ERDOGAN told UC-1, in sum and substance, that in order to obtain 500 grams of heroin, ERDOGAN needed to sell 100 grams of heroin himself and use the proceeds as a down payment for a large "re-up," which I understand to mean getting a bulk supply of drugs.

d. On or about July 7, 2021, at approximately 3:15 p.m., ERDOGAN arrived in what appeared to be the same sedan described in Paragraph 9(b), *supra*. UC-1, who was equipped with a video recording device that recorded UC-1's interaction with ERDOGAN, entered ERDOGAN's sedan. ERDOGAN handed UC-1 a ziplock baggie containing a substance that appeared to be heroin, which later tested positive for heroin and fentanyl. UC-1 weighed the Ziplock baggie, and it was approximately 100 grams. UC-1 then gave ERDOGAN \$6,800, which included payment for the 100 grams of heroin, as well as the remaining payment for the Firearm.

e. On or about July 16, 2021, ERDOGAN called UC-1 to confirm that UC-1 intended to go through with the purchase of 500 grams of heroin for \$30,000. UC-1 confirmed his intention to complete the transaction, and ERDOGAN and UC-1 discussed meeting on July 20, 2021 at the Meeting Location to complete the transaction.


f. On or about July 20, UC-1 observed ERDOGAN arrive at the Meeting Location at approximately 1:55 p.m. In preparation for the meeting, law enforcement agents situated themselves to physically surveil the area around the Meeting Location. Upon observing ERDOGAN, UC-1 called law enforcement to give a pre-arranged signal. Law enforcement then approached ERDOGAN and placed ERDOGAN under arrest. At the time of arrest, ERDOGAN had in his possession two ziplock baggies that weighed

approximately 509 grams and contained a substance that resembled the heroin and fentanyl that ERDOGAN sold UC-1 on July 1, 2021 and July 7, 2021. I therefore believe the substance seized from ERDOGAN on July 20, 2021 contained heroin and fentanyl.

WHEREFORE, deponent respectfully requests that WILLIAM ERDOGAN, the defendant, be imprisoned or bailed, as the case may be.

  
\_\_\_\_\_  
Detective Anthony Mangano  
NYPD

Sworn to me this  
21st day of July, 2021

  
\_\_\_\_\_  
THE HONORABLE KATHARINE H. PARKER  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK